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**DEPARTMENT OF HEALTH, WELFARE  
& BIO-ENVIRONMENTAL SERVICES**  
Hazardous Materials Control

January 4, 1991



Mr. Joseph G. Wallmeyer, Director  
Environmental Division  
Naval Air Station, 6280 Code 184  
Jacksonville, Florida 32212-5000

**RE: Installation Restoration Remedial Investigation/Feasibility Study (RI/FS)  
Draft Work Plans**

Dear Mr. Wallmeyer:

The Water Resources Division (WRD) of the City of Jacksonville appreciates the opportunity to comment on the work plans being submitted to the Technical Review Committee (TRC) of the Jacksonville Naval Air Station (NAS) based on the Installation Restoration Remedial Investigation/Feasibility Study (RI/FS) of Jacksonville NAS. These plans are submitted in draft form by the U S Navy Southern Facilities Command.

Initially forty-two (42) potential sources of contamination were identified as existing at Jacksonville NAS. The concept of separating these sources into four categories is excellent. This allows related groups to be more easily addressed. The proposed groups are as listed below:

1. No Further Action;
2. Site screening;
3. Petroleum sites; and
4. Potential Sources of Contamination Requiring Cleanup, provide a sound technical basis for remediation of the very complex problem that exists at Jacksonville NAS.

Comments on the four (4) proposed groups are as follows:

1. No Further Action

The detail provided by the plan does not provide enough data to make an engineering decision on the placement of some of the areas in this group. A detailed breakdown of comments is given in Attachment A. "No Further Action Sites at Jacksonville NAS",

2. Site Screening

A review of the seven (7) sites included in the group titled "site screening" is appropriate. The sites selected for this category do not appear to have the urgency of the PSC locations based upon data available to this office.



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3. Petroleum Contamination

Cleanup of these three (3) sites (7, 19, 33) must be done according to Chapter 17-770 FAC under the supervision of DER. At the present time the WRD is not involved with these sites cleanups; and

4. Potential Sources of Contamination Requiring Cleanup

The fourteen (14) sites included in this group are appropriately selected. The WRD agrees that sites 26 and 27 should have the highest cleanup priority and work on these sites should proceed without delay. The WRD proposes the addition of four (4) test boring-soil sampling locations as shown on Attachment B entitled "Additional Boring for Sites 26 and 27".

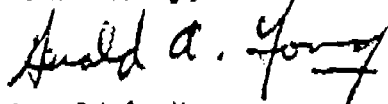
5. The WRD proposes the addition of another document to the official file on the Jacksonville NAS Site. This document shall be in a separate binder marked "No Further Action Sites". The following information should be included in this file.

1. Maps showing all site locations as well as individual site areas.
2. Reasons for original selection of sites
3. Reasons (by site) for including each site in this group
4. Results of individual site inspections, measurements or laboratory analysis supporting the reasons for inclusion in this group.

6. As the number of active sites diminishes, there could be confusion as to the status of a particular site in the process. It is requested that the minutes of all future meetings of the TRC contain a list of all 42 sites and their status.

If the WRD can be of any assistance, please contact Mr. Gerald Young at (904)630-3666.

Yours Truly,



Gerald A. Young  
Associate Pollution Control Engineer

GAY/jhr

ATTACHMENT A  
NO FURTHER ACTION SITES at Jacksonville NAS

RE: WRD letter to TRC dated January 4, 1991

Site No.	Name	Comment
1	Patrol Rd. turn - around	Do not agree - No record of asbestos inspection for the concrete rubble disposed of at this site.
6	Fuel Farm	Agree - Already cleaned up
9	Old disposal area	Do not agree - No record of asbestos inspection for the construction debris; measured VOC* is in excess of Florida drinking water standards.
10	Tank 119K	Do not agree - need more information on chemical (MIL-R-81835); details of discharge (leak or overfill). Volume of discharge; date of discharge; details of RCRA ** closure with laboratory analysis of confirmatory sampling.
17	Glass Bead Disposal area	Agree - does not exceed standards
20	Solid Waste Incinerator	Do not agree - No confirmatory sampling, request soil borings near building with TCLP*** analysis.
21	Golf Course	Agree - Already cleaned up.
22	Fort Dix	Do not agree - need soil borings tested for lead since small arms ammunition was reportedly buried in this area.
23	Old Skeet Range	Do not agree - need soil borings analyzed for TCLP metals and TRPH **** because drums, engine containers and use of lead skeet shot.
24	Scrap Metal Disposal area	Agree - Already cleaned up.

Site No.	Name	Comment
25	Building 2038	Do not agree - need to know which medical radio-isotopes were stored; why clean-up was necessary and copy of clean-up documents.
31	Asphalt mix area	Do not agree - need soil borings to confirm petroleum compounds cleaned up by testing for TRPH
32	Base Landfill	Agree - Does not exceed Florida Ground Water Guidance concentrations
34	Old Transformer Storage Building	Agree - Already cleaned up.
35	Temporary PCB Storage area	Do not agree - Need wipe tests (re EPA) for PCB since PCB containers were stored in building and the building was cleaned prior to present occupants arrival. Did a spill occur?
39	Transformer Burial area	Do not agree - need copy of laboratory analysis from confirmatory soil sampling in accordance with City Ordinance.
40	Industrial Waste Discharge area	Agree - Laboratory results do not exceed standards.

- \* VOC - abbreviation for Volatile Organic Compound
- \*\* RCRA - abbreviation for Resource Conservation and Recovery Act
- \*\*\* TCLP - abbreviation for Toxicity Characteristic Leachate Procedure
- \*\*\*\* TRPH - abbreviation for Total Recoverable Petroleum Hydrocarbons

